



FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

December 18, 1997

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Andrew Baum, Vice President
Optima Direct, Inc.
8100 Boone Boulevard
Vienna, VA 22182-2642

MUR 3774

Dear Mr. Baum:

We are in receipt of your December 3, 1997 response to our November 17 letter concerning Optima's response to the Commission's subpoena. Several of your responses raise additional questions.

In response to Question 1, requesting production of identified invoices (numbered 6154, 6183, 6160 and 6171), you state that these "invoices were not generated," noting that they "were used for internal tracking of deposits." If the use of ungenerated invoice numbers was pursuant to an established internal accounting system, please explain this system and how these deposits were treated under this system. Also produce all documents relating to or referencing the accounting system and treatment of these deposits.

Because deposit payments were apparently obtained by means other than invoices, please explain as to each invoice number how payment was obtained, how the amount of each deposit was determined and identify the Optima Direct individual seeking payment. Produce all documents relating to or referencing these communications and deposit amount determinations.

In response to the portion of Question 3 requesting identification of the electoral or geographic region encompassed by the Grams calls listed as "#1" in Ms. Schweitz November 3, 1994 memo to Mr. Sottong, you respond by noting only that "[t]he number of calls made for each script is not in our possession." In addition to information concerning the number of calls made, the question also asks for identification of the "congressional district, legislative district or other geographic region(s)" where the calls were made. Please provide this requested information.

Similarly, you respond to several other questions by noting that the requested information is "not in our possession." This response is found at:

- Question 2 (requesting scripts and revisions for the Grams/MN project);
- Question 3 (requesting the number of calls made from each script listed in the November 3, 1994 Schweitz memo to Sottong);
- Question 4 (requesting call sheets referenced in November 14, 1994 Sottong memo to Schweitz);
- Question 5 (requesting documents relating to the "set [of records] from 10-26-94" referenced in the October 27, 1994 Sexton letter to Sottong);
- Question 6 (requesting documents relating to the "PA Pro-Life Federation" calls referenced in Invoice #6197);
- Question 7 (requesting documents concerning lists used to make "Original Select" calls referenced in Invoice #6197);
- Question 8 (requesting documents reflecting the number of contacts attributable to each Senate and Congressional race listed in the NRLC's GOTV list to Optima);
- Question 9 (requesting scripts for specifically identified phone call programs referenced in Civic Development Groups invoices); and
- Question 10 (requesting scripts for calls made by Civic Development Group for programs denoted GO410 and GO410-II).

For each document containing responsive information not presently in your possession, identify the document, provide the dates the document was in Optima Direct's possession, and state the disposition of the document. If a document was transferred to another entity or individual, identify this entity and individual, state the date when transferred, the purpose for the transfer, and if the transfer was made at the recipient's request. If a document was discarded, state the date when the document was discarded, the reason why the document was discarded and identify the individual involved. If transferred or discarded pursuant to an established internal document retention policy, please explain the policy and the application of the policy separately as to each unavailable document.

Dawn Odrowski
Attorney